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**Additional Comments Submitted for STB Docket EP-726-0
Proposal #1: Notice of Proposed Rule Making
Definition of “On-Time Performance”
February 6, 2016**

Submitter

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A. Background

**Proposal #1: Notice of Proposed Rule Making:
Definition of “On-Time Performance”**

Definition of “on-time performance” for cases brought before STB under Section 213, Passenger Rail Investment and Improvement of Act (PRIIA) of 2008

Section 24080(f) allows the Board to initiate or Amtrak/Other Eligible Complainants to file a complaint with the STB requesting an investigation if the “**on-time performance**” of any inter-city passenger trains averages less than 80% for any two consecutive quarters.

A Train is “on time” if it arrives at last station no more than 5 min/100 miles traveled or 30 minutes after scheduled arrival time, whichever is less.

B. Additional Comments

In addition to comments posted on February 5, 2016, I approve of the proposed Definition of **“On-Time Performance”** of the Surface Transportation Board (STB) because the decrease in **“On-Time Performance”** in FY 2015 has severely hurt Amtrak ridership and revenues and has prevented passenger rail from realizing the “Passenger Rail Revolution” that had been occurring in the United States, especially in Virginia, since 2009.

The negative consequences of a significant delay have a disproportionate effect on passenger trains than on freight trains. Passengers who are 1 – 2 hours late can 1) miss their connections; 2) miss meetings and appointments; and 3) greatly inconvenience those meeting them at stations. The result is that more passenger train travelers will switch to less environmentally sensitive modes of transit, such as cars and planes.

In contrast, the effect of a 1 – 2 hour delay in a coal, timber, or oil freight shipment would unlikely cause the shipper to change modes of transit. First, there may be no other mode of transit. Second, a delay of this magnitude would likely have no negative consequences.

Based upon Amtrak’s September 2015 Monthly Performance Report, Table E-1, which includes figures for the entire Fiscal Year, I have posted three graphs that illustrate the problem of a lack of **“On-Time Performance”** upon Amtrak’s three types of services: 1) Northeast Corridor Trains; 2) State-Supported Trains; and 3) Long Distance Trains. The Key Observations from these graphs are the following:

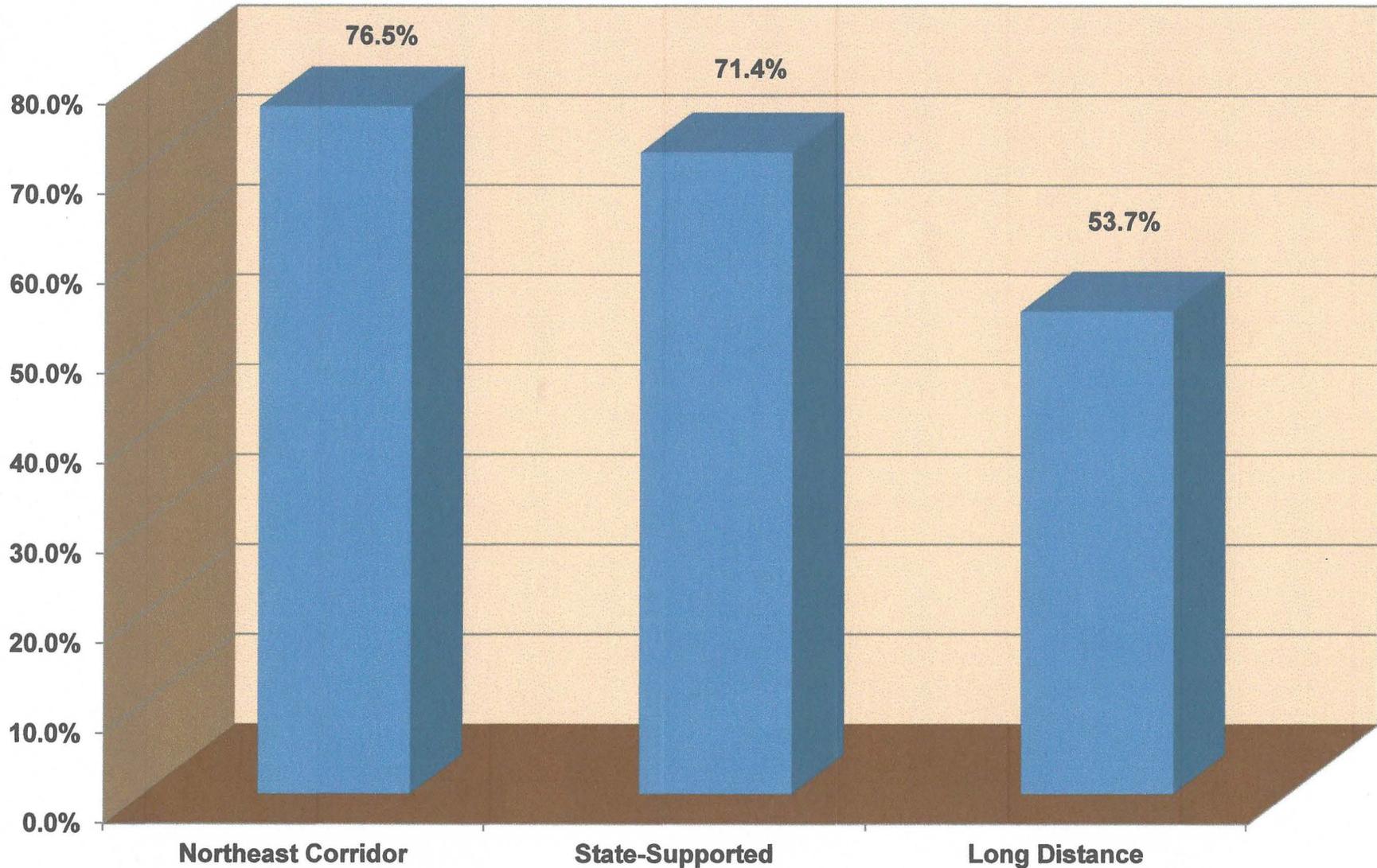
1. The **“On-Time Performance”** for the three types of services decreased in this order: a) Northeast Corridor (76.5%); b) State-Supported Trains (71.4%); and c) Long Distance Trains (53.7%).
2. For State-Supported Trains, the problem of **“On-Time Performance”** was worst (less than 50%) for these trains: New York – Niagara Falls (44.5%); Pere Marquette (40.9%); Wolverine (39.4%); Downeaster (32.4%); and Illini/Saluki (27.2%).
3. For Long Distance Trains, the problem of **“On-Time Performance”** was much worst (less than 50%) for these trains: Empire Builder (48.9%); Silver Star (48.1%); Southwest Chief (47.9%); Lake Shore Limited (40.9%); Texas Eagle (36.7%); and Capitol Limited (34.4%).

Additionally, for trains like the Cardinal, the **combined “On-Time Performance” (53.1%)**, reported on Amtrak’s website on February 6, 2016, for the Dec 2014 to Dec 2015 Period was very deceiving because the **“On-Time Performance” for the westbound Train 51 (72.2%) was 38.1 points higher** than for the **eastbound Train 50 (34.1%)**, making Train 50 one of the worst trains in the Amtrak system and making it a prime candidate for improvement.

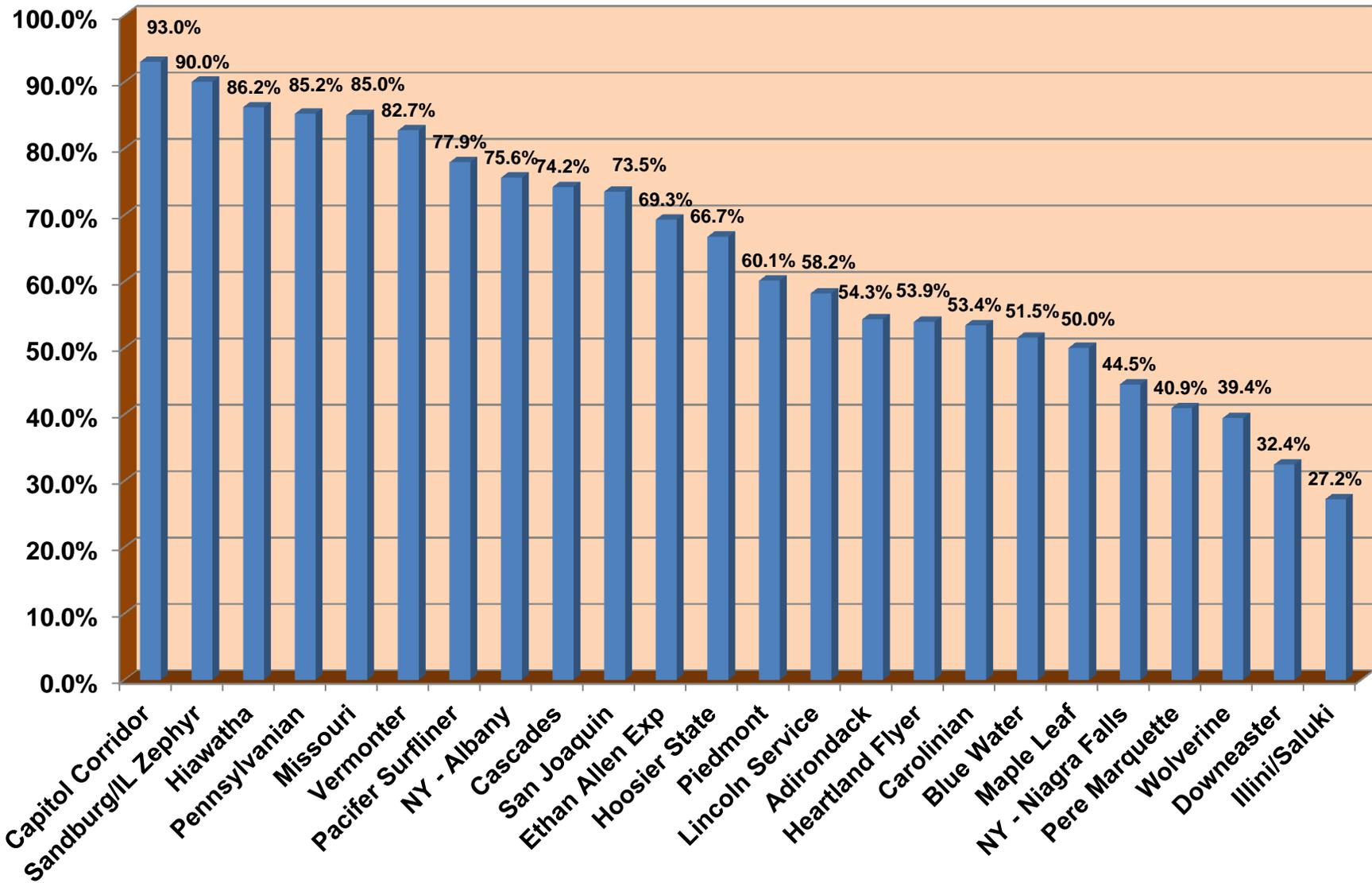
C. Suggestion on Priorities

The STB needs to concentrate on the passenger services with the worst **“On-Time Performances”**, such as the eastbound Cardinal, Train 50.

**% On-Time Performance in FY 2015 for Amtrak's Northeast Corridor,
State-Supported, and Long Distance Trains by Dan Peacock
(Based on Amtrak's Sep 2015 Monthly Performance Report, Table E-1)**



On-Time Performance in FY 2015 for Amtrak's State-Supported Trains by Dan Peacock (See Amtrak's Sep 2015 Monthly Performance Report, Table E-1)



% On-Time Performance in FY 2015 for Amtrak's Long Distance Trains by Dan Peacock. (See Amtrak's Sep 2015 Monthly performance Report, Table E-1)

